

[Submitting Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

No. 4:22-md-03047

MDL No. 3047

This Document Relates To:

Personal Injury Bellwether Plaintiffs

**DECLARATION OF JESSICA C.
COLOMBO IN RESPONSE TO
MAGISTRATE JUDGE KANG'S MAY
30, 2025 ORDER**

Judge: Hon. Yvonne Gonzalez Rogers

DECLARATION OF JESSICA C. COLOMBO

Pursuant to 28 U.S.C. § 1746, I, Jessica C. Colombo, declare as follows:

1. I am an attorney at Motley Rice LLC, and counsel for the Personal Injury and School District/Local Government Entity Plaintiffs in this litigation. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Pursuant to the Court's order dated May 3, 2025 (Dkt. #1993), attached are true and accurate copies of the following correspondence in which Personal Injury Bellwether Plaintiffs disclosed to Defendants the sources they were collecting and searching for responsive ESI:

- a. **Exhibit 1:** June 19, 2024 correspondence from counsel for Plaintiffs Laurel Clevenger, Klinten Craig, and David Melton;
- b. **Exhibit 2:** June 19, 2024 correspondence from counsel for Plaintiff J.D.;
- c. **Exhibit 3:** June 19, 2024 correspondence from counsel for Plaintiffs D’Orazio and Smith;¹
- d. **Exhibit 4:** June 19, 2024 correspondence from counsel for Plaintiff Guzman;
- e. **Exhibit 5:** June 19, 2024 correspondence from counsel for Plaintiff McNeal;
- f. **Exhibit 6:** June 19, 2024 correspondence from counsel for Plaintiff Mullen; and
- g. **Exhibit 7:** August 30, 2024 correspondence from counsel for Plaintiff Mullen.

3. Attached as **Exhibit 8** is a July 3, 2024 email from Daniel J. Connolly, an attorney at Faegre Drinker who negotiated Defendants’ Requests for Production Set One, and a responsive letter from me, sent on behalf of Personal Injury Bellwether Plaintiffs, dated July 9, 2024. In Attorney Connolly’s email, he summarizes a July 2, 2024 conferral during which Personal Injury Bellwether Plaintiffs informed Defendants that “they are producing custodial files and RFP [Set One] responsive information discovered largely through the application of Plaintiffs’ search terms to the Plaintiffs’ data sources. Plaintiffs disclosed the data sources and the search terms to Defendants on June 19, 2024.”

4. Following negotiations regarding the scope of Requests for Production 5 and 6, which sought documents relating to Plaintiffs’ use of streaming services, the Parties agreed that Plaintiffs would disclose whether any individual Plaintiff did not have streaming accounts that were used on routine devices² that were not available for forensic imaging, and where an account or profile was exclusively used by Plaintiff. Although not required to pursuant to the terms of the

¹ A disclosure on behalf of Plaintiff B.H., who is no longer a party to this litigation, is omitted from Exhibit 3.

² See DMO No. 8 at 8 (Dkt. 1025).

1 Parties' agreement, certain Plaintiffs provided additional information regarding their use of
2 streaming services. Attached are true and correct copies of the following correspondence:

- 3 a. **Exhibit 9:** A series of emails from counsel for Plaintiff Craig, identifying
4 Facebook Videos, YouTube, Apple Music, Spotify, and Apple TV;
5 b. **Exhibit 10:** September 30, 2024 email from counsel for Plaintiff Melton
6 identifying Apple TV, Apple Music, YouTube, and Spotify; and
7 c. **Exhibit 11:** September 30, 2024 email from counsel for Plaintiff Clevenger
8 identifying Spotify.

9 5. I am unaware of additional correspondence responsive to the Court's May 3, 2025
10 order.

11 I declare under the penalty of perjury that the foregoing is true and correct.

12 Executed on June 2, 2025 in Hartford, Connecticut.

13 /s/ Jessica C. Colombo
14 Jessica C. Colombo

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